

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TOWANDA J. MAHONE,

Plaintiff,

v.

Civil Action No. 3:19-cv-00373-HEH

RIVER CITY RECOVERY, LLC

LOSS PREVENTION SERVICES, INC.

Defendants.

DECLARATION IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

I, Ian E. Vance, declare under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am licensed to practice law in the Commonwealth of Virginia and this Court.
2. I am counsel of record for the Plaintiff, Towanda Mahone, in this case.
3. I have personal knowledge of the facts stated in this Declaration.
4. A complaint was filed herein on May 17, 2019 and service of process was had on the Defendant, River City Recovery, LLC. ("River City"), via its registered agent James E. Kane on May 29, 2019.
5. On June 4, 2019, I filed electronically with the ECF filing system the Returned Summons. ECF No. 4.
6. Accompanying this Declaration as "Exhibit A" is a copy of the information page for River City from the Commonwealth of Virginia State Corporation Commission.
7. Exhibit A shows that the registered agent and mailing address for River City is the same as used in the proof of service.

8. More than twenty-one (21) days have elapsed since service was made on River City, and River City has failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.

I declare the foregoing to be true and correct, under penalty of perjury, this the 11th day of July, 2019.

A handwritten signature in blue ink, appearing to read "Ian E. Vance".

Ian E. Vance

EXHIBIT A

Alert to business entities regarding mailings from VIRGINIA COUNCIL FOR CORPORATIONS or U.S. BUSINESS SERVICES is available from the Bulletin Archive link of Clerk's Office website.

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General

SCC ID: S2278390
 Entity Type: Limited Liability Company
 Jurisdiction of Formation: VA
 Date of Formation/Registration: 6/28/2007
 Status: Fee delinquent

Select an action

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Principal Office

2500 AUSTIN AVENUE
 RICHMOND VA23223

[New Search](#) [Home](#)

Registered Agent/Registered Office

JAMES E KANE
 1313 E CARY ST
 RICHMOND VA 23219
 RICHMOND CITY 216
 Status: Active
 Effective Date: 1/27/2010

Screen ID: e1000

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